



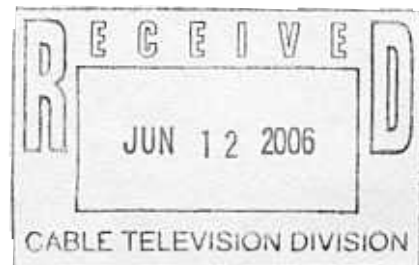
# TOWN OF NORTON

## BOARD OF SELECTMEN

70 EAST MAIN STREET

MUNICIPAL CENTER, NORTON, MASS. 02766

TELEPHONE (508) 285-0210



June 8, 2006

Ms. Andrea Nixon  
Clerk, Cable Television Division  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02111

Dear Clerk:

The Town of Norton would like to register its strong opposition to Verizon's March 16, 2006, rulemaking petition filed with the Cable Division of the Department of Telecommunications and Energy. Verizon's petition proposes extremely unreasonable new rules for initial cable licensing.

The proposed rules would require a municipality to hold a public hearing on an initial cable television license application within sixty (60) days of the application filing and would require only thirty (30) days from the time of the public hearing for the municipality to approve or disapprove the application, and issue the actual license in case of approval.

As most local officials will tell you, it is impossible to conclude a proper initial license application review, negotiation, license drafting, and issuance within thirty (30) days of the public hearing. Such an initial licensing time frame would be untenable in the best of circumstances and is particularly untenable now in light of the many questions of first impression and complex issues raised by the non-standard terms and conditions commonly reported to be included in Verizon-proposed cable licenses.

As you know from RCN's initial licensing experience, cable operators willing to negotiate customary and standard cable licenses enjoy reasonable and fast municipal licensing. The existing license timetables have worked well for decades. They should not be changed at the behest of a single proponent. Note that Congress contemplated and provided for a three-year renewal process when it more comprehensively and carefully set forth cable licensing rules in the 1984 Cable Act. This framework worked well for decades, and there is no rational basis for casting aside the time tested licensing rules and replacing them with radically abbreviated rules.